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T.R.A. DOCKET ROOM

October 1, 2003

Tennessee Regulatory Authority
Attn: Mr. Ron Jones, Director
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket No. 03-00502, Workshop to Gather Information from the
Telecommunications Industry Related to Preventing Violations of
Tenn. Code Ann. 65-21-114

Dear Mr. Jones:

PAETEC Communications, Inc. ("PAETEC") is a switchless reseller of long distance telecommunication services in the state of Tennessee. PAETEC relies on information received from our underlying carrier and, as such, expects that information to be in compliance with Section 65-21-114(a).

If you have any further questions, please feel free to contact me at (585) 340-2822.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Judith Messenger', written over a horizontal line.

Judith Messenger
Senior Regulatory Analyst & CABS Coordinator



STACEY A. KLINZMAN

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
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T.R.A. DOCKET ROOM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Granite Telecommunications, LLC ("Granite") - Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

Granite Telecommunications, LLC, a Tennessee certificated facilities-based and resale local exchange carrier and resale interexchange carrier, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: Granite is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a UNE-P based local exchange carrier and a non-facilities based interexchange carrier, Granite does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. Granite's underlying carriers, Bell South, Qwest and Global Crossing, do not provide Granite with CARE records that distinguish intracounty calls from other instate calls.
3. To Granite's knowledge, Granite's underlying carriers charge Granite for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
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- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

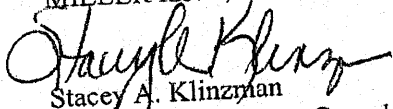
Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: Granite has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.



Stacey A. Klinzman
Director - Regulatory Compliance

Regulatory Consultants to
Granite Telecommunications, LLC

cc: Geoffrey Cookman, Granite Telecommunications, LLC